EPA Registration File
84229-5 Vol.1 Part 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

DEC 30 2010

Ross Gilbert
Pyxis Regulatory Consulting, Inc.
Agent for: Tide International USA Inc.
4110 136th Street, NW
Gig Harbor, Washington 98332

Subject: Triadimefon Technical
EPA Registration Number 84229-5
Decision D441701: Your label amendment application
dated September 27, 2010

Dear Mr. Gilbert,

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable, provided that you comply with the following conditions.

1. Make the following change to the label.

Change the first sentence in the second paragraph in the "DIRECTIONS FOR USE" section on page 2 from "This product is not for formulation into end-use products labeled for outdoor residential use on lawns, turf, home gardens, ornamentals, flowers, shrubs, or trees." to "Do not formulate into end-use products labeled for residential use on lawns, home gardens, ornamentals, flowers, shrubs, vines, and trees."

2. Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration may be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions about this letter, please contact me at (703)308-9443 or kish.tony@epa.gov.

Sincerely yours,

Tony Kish
Product Manager (22)
Fungicide Branch
Registration Division (7504P)

Attachment: Master label stamped "ACCEPTED with COMMENTS"

Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:
Triadimefon: 99.0%
OTHER INGREDIENTS: 1.0%
TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If swallowed:	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
There is no specific antidote. Treat symptomatically. This compound does not cause any definite symptoms that would be diagnostic. Poisoning is accompanied by hyperactivity followed by sedation.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.	

EPA Reg. No. 84229-5
EPA Est. No.

Manufactured for:
Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

Net Weight:

ACCEPTED
with COMMENTS
In EPA Letter Dated:

DEC 3 0 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

84229-5

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed, absorbed through skin, inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is **not** for formulation into end-use products labeled for outdoor residential use on lawns, turf, home gardens, ornamentals, flowers, shrubs, or trees. Subject to that restriction, this product is only for formulation into a fungicide for the following use(s):

(1) golf course turfgrass, sod farm turfgrass, outdoor- and greenhouse-grown ornamentals (trees, shrubs, flowering plants, including roses), azaleas (for control of pine-twisting rust only), pine trees (including Christmas trees), pine seedlings, pine seed, and pineapple (pre-plant dip and postharvest dip only);

(2) uses for which US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and

(3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area. If product spills or container leaks, carefully sweep and collect material into a pile. Follow directions below for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the drum for recycling, if available.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:
Triadimefon: 99.0%
OTHER INGREDIENTS: 1.0%
TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

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EPA Reg. No. 84229-5
EPA Est. No.

Manufactured for:
Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

Net Weight:

Compared to the 8/23/10 "ACCEPTED" label. JB

delete because [redacted] lawns" already

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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DIRECTIONS FOR USE

Do not formulate

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

added "sod farm"

This product is **not** for formulation into end-use products labeled for outdoor residential use on lawns, turf, home gardens, ornamentals, flowers, shrubs, or trees. Subject to that restriction, this product is only for formulation into a fungicide for the following use(s):

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(2) uses for which US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and

(3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

changed from "not listed on this label if"

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

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The Directions for Use of this product must be followed carefully.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

84229-5

Label Committee issue - voluntary negative use statements - can this issue be put on next mtg agenda?

Tony Kish to: Meredith Laws 11/24/2010 04:35 PM

Cc: Cynthia Giles-Parker, John Bazuin, Erin Koch

Meredith - can you please advise when I can present this issue assuming the questions below have not been previously been answered.

1. We have three pending fast track amendments (84229-5-triadimefon technical; 80697-3 and 80697-4 paclobutrazol end uses) where a registrant is voluntarily adding the negative use statement below because of data comp issues with ORETF --

"Not for outdoor residential use on lawns, turf, home gardens, ornamentals, flowers, shrubs or trees. This restriction applies to all uses listed on this label".

2. These products have current approved uses for --"golf course turfgrass, sodfarm turfgrass, outdoor and greenhouse grown ornamentals including trees, shrubs, flowering plants, azaleas, pine trees, pine seedlings, pine seeds, and pineapple as pre-plant/post-harvest dip".

3. To my knowledge the only AI with negative statements is chlorothalonil where EPA initiated and required the following statements:

> **For MPs - "Do not formulate into products labeled for use on home lawns and turf sites associated with apartment buildings, daycare centers, playgrounds, playfields, recreational park athletic fields, athletic fields located on or next to schools (ie., elementary, middle and high schools), campgrounds, churches, and theme parks".**
>
> **For EPs - "Do not use on home lawns and turf sites associated with apartment buildings, daycare centers, playgrounds, playfields, recreational park athletic fields, athletic fields located on or next to schools (ie., elementary, middle and high schools), campgrounds, churches, and theme parks."**

4. Here are questions needing answers:

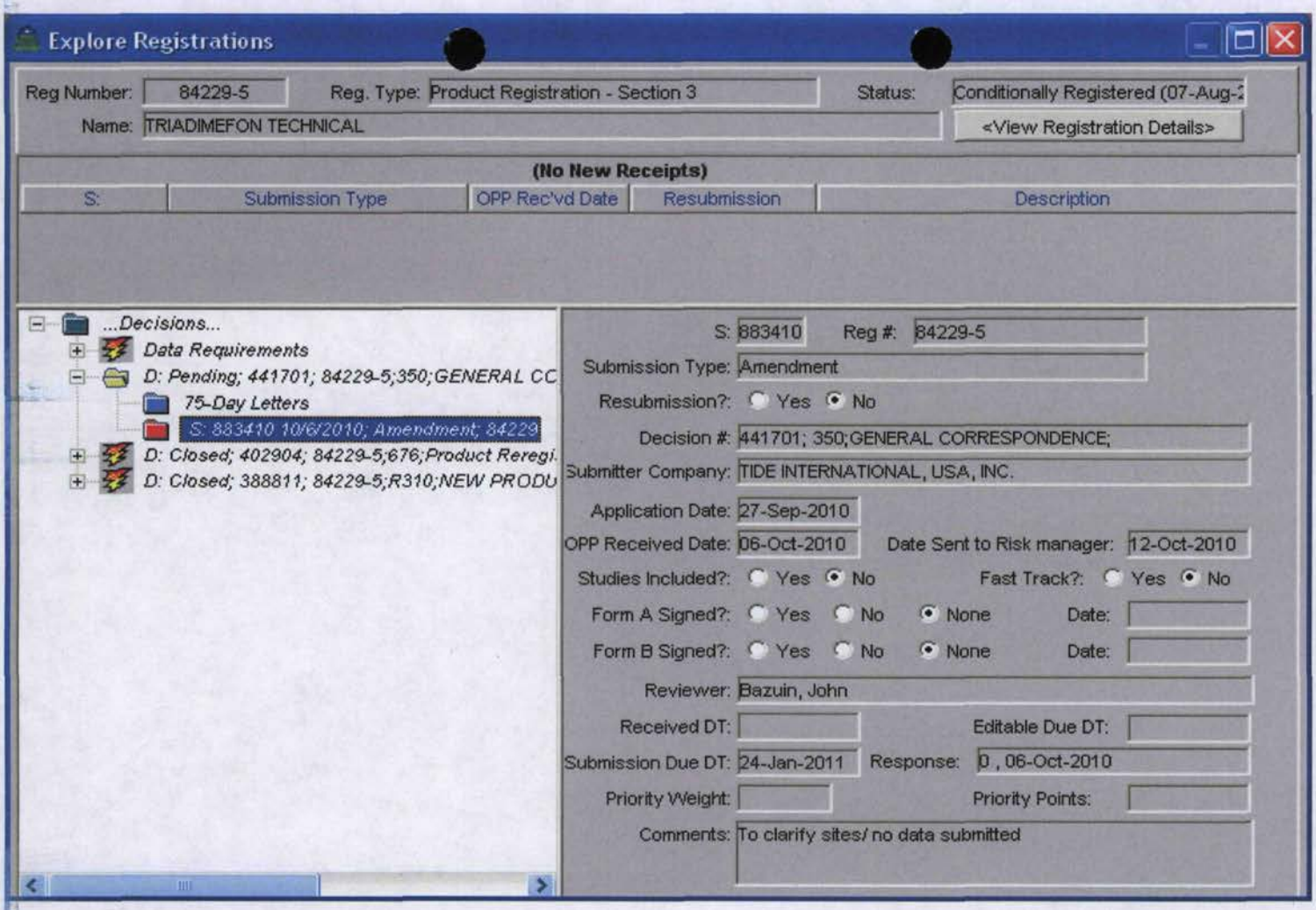
A. Do you agree that if a use is not on the label, then that product can not be used for that use, and negative use statements are not needed, and we don't want to get in to the business of allowing registrant initiated negative use statements?

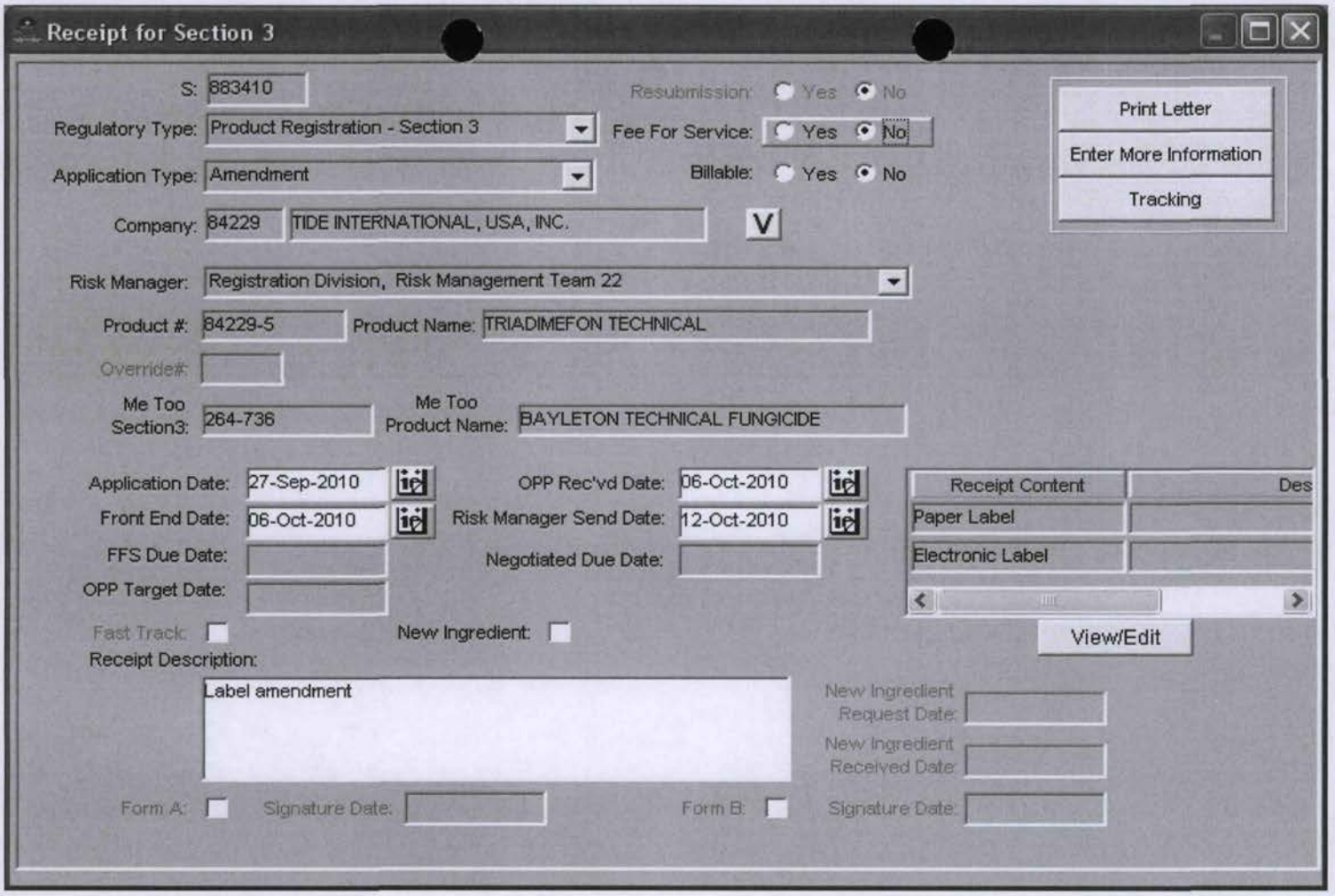
B. Do you agree with the registrant that this is not a use deletion requiring a FR (ie. can't delete a use not on the label), but a use clarification?

C. What do we do about existing stocks and end-use products made from the technical?

D. Is there a pending ORETF petition against these products?

Thanks,
Tony Kish, Product Manager,
Team 22, Fungicide Branch;
Registration Division
703-308-9443


Explore Registrations
Reg Number: 84229-5
Reg. Type: Product Registration - Section 3
Status: Conditionally Registered (07-Aug-2
Name: TRIADIMEFON TECHNICAL
<View Registration Details>
(No New Receipts)
S:
Submission Type
OPP Rec'vd Date
Resubmission
Description
...Decisions...
Data Requirements
D: Pending; 441701; 84229-5;350;GENERAL CC
75-Day Letters
S: 883410 10/6/2010; Amendment; 84229
D: Closed; 402904; 84229-5;676;Product Reregi
D: Closed; 388811; 84229-5;R310;NEW PRODU
S: 883410
Reg #: 84229-5
Submission Type: Amendment
Resubmission?: Yes No
Decision #: 441701; 350;GENERAL CORRESPONDENCE;
Submitter Company: TIDE INTERNATIONAL, USA, INC.
Application Date: 27-Sep-2010
OPP Received Date: 06-Oct-2010
Date Sent to Risk manager: 12-Oct-2010
Studies Included?: Yes No
Fast Track?: Yes No
Form A Signed?: Yes No None
Date:
Form B Signed?: Yes No None
Date:
Reviewer: Bazuin, John
Received DT:
Editable Due DT:
Submission Due DT: 24-Jan-2011
Response: 0 , 06-Oct-2010
Priority Weight:
Priority Points:
Comments: To clarify sites/ no data submitted


Receipt for Section 3
S: 883410
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Amendment
Billable: Yes No
Company: 84229 TIDE INTERNATIONAL, USA, INC.
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 22
Product #: 84229-5
Product Name: TRIADIMEFON TECHNICAL
Override#:
Me Too Section3: 264-736
Me Too Product Name: BAYLETON TECHNICAL FUNGICIDE
Application Date: 27-Sep-2010
OPP Rec'vd Date: 06-Oct-2010
Front End Date: 06-Oct-2010
Risk Manager Send Date: 12-Oct-2010
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Des
Paper Label
Electronic Label
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
Label amendment
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 12, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
TIDE INTERNATIONAL, USA, INC.
C/O PYXIS REGULATORY CONSULTING, INC
4110 136TH ST. NW
GIG HARBOR, WA 98332-

PRODUCT NAME: TRIADIMEFON TECHNICAL
COMPANY NAME: TIDE INTERNATIONAL, USA, INC.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 84229-5
EPA RECEIPT DATE: 10/06/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 22, at (703) 308-9443.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 12, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
TIDE INTERNATIONAL, USA, INC.
C/O PYXIS REGULATORY CONSULTING, INC
4110 136TH ST. NW
GIG HARBOR, WA 98332-

PRODUCT NAME: TRIADIMEFON TECHNICAL
COMPANY NAME: TIDE INTERNATIONAL, USA, INC.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 84229-5
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Sincerely,

P. K. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{883410q~

This package includes the following

- ○ New Registration
- ◉ Amendment

□ Studies? □ Fee Waiver?

□ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 22

Receipt No. S- 883410

EPA File Symbol/Reg. No. 84229-5

Pin-Punch Date: 10/6/2010

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Parent/Child Decisions:

▣ Inert Cleared for Intended Use ▣ Uncleared Inert in Product

Reviewer: [signature] Date: 10/8/10

Remarks:

Fungicide Branch Assignment Sheet

Date Delivered to PM OCT 13 2010 SH
(date & initial)

Mary Waller	Tony Kish	Shaja Joyner
PM 21	PM 22	PM 20

Risk Managers

Tamue	John	Lisa	Tawanda
	Tracy	Rose	Janet
Summer	Shaunta	Bob	Heather

Comments to Summer Rotadex 350

Comments to Risk Manager Same as 80697-3 and 80697-1 80697-4

Date to Summer TK 10/14/10
(date & initial)

Date to Risk Manager (date stamp & initial area below)

(X) Hold
* NOT RELEASED YET

Fungicide Branch
FAST-TRACK AMENDMENTS – Completeness Screening Checklist

Expert In-Processing Signature: 8/11 PM 32

EPA Reg. No: 84229-5		EPA Receipt Date: 10/6/10			
		Yes	No	N/A	Notes
1.	Application Form (EPA 8570-1) signed?	Y			
2.	Confidential Statement of Formula (EPA form 8570-29) signed?			Y	
3.	Certification with Respect to Citation of Data (EPA form 8570-34) signed?			Y	
4.	Formulator's Exemption Statement (EPA Form 8570-27) signed?			Y	
5.	Data Matrix (EPA Form 8570-35) [Applicable for adding Me-Too uses]			Y	
	a. Selective Method?				
	b. Cite-All Method? Applicant owns data or list only companies offered to pay				
	c. Public copy of Data Matrix provided? See PR Notice 98-5				
6.	Label included (5 copies)?			D	

FB Comments:

INERTS TEAM

This product is for: Food Use_____ Non-Food Use_____

Inerts cleared for Food Use?

YES_____ NO_____

Inerts cleared for Non-Food Use?

YES_____ NO_____

Inerts team comments:

Signature:_____

Date:_____

There is an **ELECTRONIC LABEL** for this action

You can use Acrobat to compare the e-label to the previous version (and find the changes). You can also use Acrobat to mark-up the e-label with your comments.

If e-label was submitted via

CD-ROM with paper application

then you will find e-label in

Electronic Label Library

If the e-label is not found in the ELL then it was probably not named correctly and could not be entered into the ELL. However, the file can be retrieved from the CD which is retained by the Front End.

or

If e-label was submitted via

XML E-Submission (no paper)

then you will find e-label in

Documentum

See overview of processing e-labels on other side of this sheet.
If you have any questions on e-labels, please contact one of your division e-label experts:

AD	Willie Abney	308-1689
	Renae Whitaker	308-7003
	Tracy Lantz	308-6415
BPPD		
RD	Tom Harris	308-9423

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 27, 2010

COURIER DELIVERY

Tony Kish (PM 22)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Tide International USA, Inc. – Triadimefon Technical (EPA Reg. No. 84229-5)
Amendment to clarify use patterns

Dear Mr. Kish,

On behalf of Tide International USA, Inc., we would like to clarify the use sites on the Triadimefon Technical (EPA Reg. No. 84229-5) label, specifically by restricting use on all residential uses (including lawns, gardens, ornamentals, or other outdoor residential areas). Because we do not consider this a use deletion and only a use pattern clarification, Tide International USA, Inc. does not believe a 180-day comment period is applicable, but would seek a waiver of this comment period if the Agency deems it appropriate.

In support of this label amendment we submit the following documents:

1. Completed Application for Amendment (EPA Form 8570-1)
2. One (1) copy of the Triadimefon Technical label with changes tracked
3. One (1) copy of the Triadimefon Technical label with changes incorporated
4. A CD containing an electronic version of the label
5. Certification with Respect to Label Integrity
6. Letter of Authorization

Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Wang; Tide International USA, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☑ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
84229-5	T. Kish	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Tide International USA, Inc. / Tridimefon Technical	22	

5. Name and Address of Applicant *(Include ZIP Code)*
Tide International USA, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

☑ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of amended label to clarify use sites on the label. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Tide International USA, Inc. believes this action is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☐ Plastic ☐ Glass ☐ Paper ☑ Other (Specify) lined HDPE drum
** Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☐ Container	50 kg	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☑ Lithograph / Paper glued / Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Ross Gilbert	Agent	(253) 853-7060

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingllly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	
[signature]	Agent	
4. Typed Name	**5. Date**	
Ross Gilbert	9/27/10	

TIDE INTERNATIONAL USA INC.

21 HUBBLE, IRVINE, CA 92618, USA • Tel: 1-949-679-3535 • Fax: 1-949-679-3538

August 4, 2008

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang,Ph.D
Vice President

cc: Pyxis Regulatory Consulting, Inc.

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL

EPA Registration #	Date Submitted to EPA	Electronic file name
84229-5	September 27, 2010	084229-00005.20100927.Tridimefon Technical use clarification.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

9/27/10
Date

Michael Kellogg

Name (typed)

Agent

Title

Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:
Triadimefon: 99.0%
OTHER INGREDIENTS: 1.0%
TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If swallowed:	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
There is no specific antidote. Treat symptomatically. This compound does not cause any definite symptoms that would be diagnostic. Poisoning is accompanied by hyperactivity followed by sedation.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.	

EPA Reg. No. 84229-5
EPA Est. No.

Manufactured for:
Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

Net Weight:

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed, absorbed through skin, inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is **not** for formulation into end-use products labeled for outdoor residential use on lawns, turf, home gardens, ornamentals, flowers, shrubs, or trees. Subject to that restriction, this product is o~~O~~nly for formulation into a fungicide for the following use(s):

(1) golf course turfgrass, sod farm turfgrass, outdoor- and greenhouse-grown ornamentals (trees, shrubs, flowering plants, including roses), azaleas (for control of pine-twisting rust only), pine trees (including Christmas trees), pine seedlings, pine seed, and pineapple (pre-plant dip and postharvest dip only);

(2) uses for which US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and

(3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area. If product spills or container leaks, carefully sweep and collect material into a pile. Follow directions below for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the drum for recycling, if available.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: JAN 22 2008	EPA Reg. Number: 84229-L

	Check List Item	Yes	No	N/A
1	Has the **PRIA Fee been Paid**; is a copy of the check or Pay.gov receipt included in the Submission Package?	X		
2	Is an **Application Form** (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	X		
3	Is a **Confidential Statement of Formula** (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	X		
4	Is a **Formulator's Exemption Statement** (EPA Form 8570-27) Included in the Submission Package?		X	
5	Is a **Certification with Respect to Citation of Data** (EPA Form 8570-34) Included in the Submission Package?	X		
6	Is a **Data Matrix** (EPA Form 8570-35) Included in the Submission Package?	X		
7	Is a **Label** Included in the Submission Package?	X		
8	Are **Data** Included in the Submission Package?	X		
9	**Is the Submission an Amendment?**		X	

Material to be added to an e-Jacket/Jacket

Reg. No. 81229-5

Description: rar

1. ☑ **Placement within the e-Jacket/jacket:**
   - ☑ **Default: (chronological, top = newest)**
   - ☐ **File Location: (PDF page number, i.e., "before page 45")**

2. ☑ **Send to Data Extraction contractors this material:**
   - ☑ **Newly stamped accepted label**
   - ☐ **Notification**
   - ☑ **New CSF**
   - ☐ **Other:** _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Erik Kraft

Phone: 308-9358 **Division:** RD

Date: 8-23-10

Created August 14, 2008

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7504P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

NOTICE OF PESTICIDE:
___Registration
__X_Reregistration
(under FIFRA, as amended)

EPA Reg. Number:	Date of Issuance:
84229-5	AUG 23 2010
Term of Issuance:	
Name of Pesticide Product: Triadimefon Technical	

Name and Address of Registrant (include ZIP Code):
Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is reregistered in accordance with FIFRA provided that you:

1) Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.

Signature of Approving Official:	Date:
Tony Kish Product Manager 22 Fungicide Branch Registration Division (7504P)	AUG 23 2010

A stamped copy of the label is enclosed for your records. Products shipped after 12 months from the date of this letter or the next round of printing must bear the new revised label. If these EPA conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA. Your release for shipment of the product constitutes acceptance of these EPA Reg. conditions. This label supersedes all other previously accepted labels. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

Enclosure: Product Chemistry Review
Acute Toxicology Review

Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

Triadimefon: 99.0%

OTHER INGREDIENTS: 1.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If swallowed:	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
There is no specific antidote. Treat symptomatically. This compound does not cause any definite symptoms that would be diagnostic. Poisoning is accompanied by hyperactivity followed by sedation.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.	

EPA Reg. No. 84229-5
EPA Est. No.

Manufactured for:
Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

ACCEPTED
AUG 23 2010
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 84229-5

Net Weight:

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed, absorbed through skin, inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following use(s):

(1) golf course turfgrass, sod farm turfgrass, outdoor- and greenhouse-grown ornamentals (trees, shrubs, flowering plants, including roses), azaleas (for control of pine-twisting rust only), pine trees (including Christmas trees), pine seedlings, pine seeds, and pineapple (pre-plant dip and postharvest dip only;

(2) uses not listed on this label if US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and

(3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area. If product spills or container leaks, carefully sweep and collect material into a pile. Follow directions below for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the drum for recycling, if available.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

Date: 5/19/2010

Reg. No.: 84229-5
Product Name: Triadimefon Technical
PM Name/Number: Tony Kish, Risk Management Team 22

Primary Reviewer: Molly Clayton Molly Clayton 5/19/10
Secondary Reviewer: Judy Loranger J Loranger 5/25/10

New label or date of RD amended label: New, received on 7/13/09

Formulation Type: Technical chemical

Active Ingredient Assessed: Triadimefon / 109901

Other ai's in product

Name/PC code: N/A Reregistration Status or Registration Date: N/A

Note to PM:

The Risk Management and Implementation Branch V (RMIB V) believes that formulation statements #3 on Page 2 of the label, allowing use to formulate fungicide products for experimental use in compliance with the EPA requirements, is acceptable but defers to RD regarding this issue. This use was not specified in the manufacturing use section of the Triadimefon RED label table.

Assessment can be found N:\prb\label\084229-005

No label revisions are needed for this product.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Sep 3, 2009

MEMORANDUM:

Subject: EPA Reg. No.: 84229-5 / Triadimefon Technical
DP Barcode: 367820
Case No.: 2700

From: Santa K. Vinjamuri, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508P)

Santa 9/3/09
MJP

To: Harriet Edwards, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508P)

Applicant: Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

FORMULATION FROM EPA Reg. No. 84229-5 LABEL:

	% by wt.
Active Ingredient(s):	
Triadimefon.	99.0%
Inert Ingredient(s):	1.0%
Total	100.0%

BACKGROUND: In the 8 month response to the Triadimefon RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 84229-5. The Acute toxicity studies, 81-1 to 81-6 were conducted by STILLMEADOW, Inc. under MRID's: MRID 473275-06 to 473275-11 and were reviewed and found to be acceptable by TRB/SRRD on 6/11/08. PRB/SRRD concurs with TRB findings.

RECOMMENDATIONS:

- The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. 84229-5.

The acute toxicity profile for EPA Reg. No. 84229-5 is currently:

Acute Oral	III	Cited (1750 mg/kg)
Acute Dermal	IV	Cited (LD_{50}>5050 mg/kg)
Acute Inhalation	IV	Cited (LC_{50} > 2.27 mg/L)
Primary Eye	IV	Cited
Primary Dermal	IV	Cited
Skin Sensitization	Non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 084229-00005 TRIADIMEFON TECHNICAL

SIGNAL WORD: **CAUTION**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS*:

Harmful if swallowed.

*The designation of Personal Protective Equipment (PPE) for manufacturing use products does not fall under the jurisdiction of EPA, therefore, PPE has not been specified for this product.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Product ingredient source information may be entitled to confidential treatment*

DATE OUT: 21/JAN/10

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [x]; MUP [x]; EUP [ ]
BARCODE NO.: 367819 **REG./FILE SYMBOL NO.:** 84229-5
PRODUCT NAME: Triadimefon Technical **MRID NOs.:** 478016-01, 473275-01, -02, -03, -04, -05
COMPANY NAME: Tide International USA, Inc. **ACTION CODE:** 676

FROM: Shirley H. Keel, Environmental Protection Specialist
Product Chemistry Team
RMIB V/PRD (7508P)

TO: Harriet Edwards, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 2700, was issued on August 2006, for the Active Ingredient (AI) Triadimefon [1-(4-chlorophenoxy)-3,3-dimethyl-1-(1H-1,2,4-triazol-1-yl)-2-butanone]. This RED includes Triadimenol [beta-(4-chlorophenoxy)-alpha-(1,1-dimethylethyl)-1H-1,2,4-triazole-1-ethanol] and Triazole Metabolites—1,2,4-Triazole (free triazole), Triazole Alanine (TA), and Triazole Acetic Acid (TAA). According to the RED, the generic data bases supporting the reregistration of Triadimefon have been reviewed and found to be substantially complete.

In the 8-month response to the Triadimefon RED, in support of the reregistration of Triadimefon Technical, EPA Reg. No. 84229-5, the registrant submitted a Confidential Statement of Formula (CSF), a basic formulation, dated 7/2/09; a draft label received by EPA on 7/13/09; and product chemistry data in MRID Nos. 478016-01, 473275-01, -02, -03, -04 and -05.

FINDINGS:

1. EPA Reg. No. 84229-5 is a TGAI/manufacturing-use product that contains the active ingredient Triadimefon at a label claim nominal concentration of 99%.

2. The CSF for the basic formulation (7/2/09), manufactured [redacted] is acceptable. The nominal concentration of the active ingredient agrees with that on the draft label, meeting the requirements of PR Notice 91-2. The upper and lower certified limits for the active ingredient and the upper certified limits for the impurities are acceptable as per 40 CFR 158.175(c)(2).

3. The product chemistry data reported in MRID Nos. 478016-01, 473275-01, -02, -03, -04 and -05 satisfy the requirements of the Guidelines under Subgroups A and B, which pertain to Product Identity, Composition and Analysis, and Physical and Chemical Properties respectively.

4. The product chemistry statements of the draft label are acceptable. The Ingredient statement is in compliance with the requirements of 40 CFR 156.10(g) and PR Notice 91-2. The Storage and Disposal statements are acceptable in accordance with 40 CFR 156.10 and PR Notice 83-3. There are no physical/chemical hazards present in the product that will trigger the Physical or Chemical Hazards subheading.

CONCLUSIONS:

The registrant has satisfied the product chemistry data requirements for the reregistration of EPA Reg. No. **84229-5**.

Product Chemistry Data

Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	40 CFR §	MRID Number	Data Fulfilled
.1550 Product Identity and Composition	158.320	473275-01	Y
.1600 Description of Materials Used to Produce the Product	158.325	473275-01 (MSDS)	Y
.1620 Description of Production Process	158.335	473275-01	Y
.1670 Discussion of Formation of Impurities	158.340	473275-01	Y
.1700 Preliminary Analysis	158.345	473275-02 & -03	Y
.1750 Certified Limits	158.350	473275-01 & CSF (7/2/09)	Y
.1800 Enforcement Analytical Method	158.355	473275-01	Y

Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	VALUE OR QUALITATIVE DESCRIPTION	MRID Number	Data Fulfilled
.6302 Color	White to off-white	473275-04	Y
.6303 Physical State	Powder	473275-04	Y
.6304 Odor	Faint decaying/foul or sulfurous odor	473275-04	Y
.6313 Stability to Normal and Elevated temperature, Metals and Metal ions	Waiver Request MEMO (12/9/08)	473275-05	W
.6314 Oxidation/Reduction: Chemical Incompatibility	Temperature change $<2^0$C when mixed with water, monoammonium phosphate, powdered elemental iron, 1% sodium hypochlorite or gasoline.	473275-04	Y
.6315 Flammability/Flame Extension	Waiver Request MEMO (12/9/08)	473275-05	W
.6316 Explodability	Waiver Request MEMO (12/9/08)	473275-05	W

<table>
<tr>
<td>.6317 Storage Stability of Product</td>
<td>The test substance was stored for one year (1/17/07 ~ 1/28/08) at 20^{0}C in semi-transparent 60 ml. HDPE bottles with screw top lids. At each observation period (0, 3, 6, 9 and 12 months of storage), the test substance samples were removed and weighed. The test substances were physically observed and the amount of the active ingredient was determined. The results of the assays are shown in the following table.
<table>
<tr><th>Month</th><th>Triadimefon (%)</th><th>Test Substance</th></tr>
<tr><td>0</td><td>99.21</td><td>Very fine white powder, forms clumps when allowed to sit</td></tr>
<tr><td>3</td><td>99.62</td><td>Powder has formed clumps</td></tr>
<tr><td>6</td><td>99.28</td><td>No change from month 3</td></tr>
<tr><td>9</td><td>99.11</td><td>No change from month 3</td></tr>
<tr><td>12</td><td>98.87</td><td>No change from month 3</td></tr>
</table>
The test substance samples had slight weight fluctuations after 3, 6, 9 and 12 months of storage. Overall, Triadimefon Technical appeared to be stable with no signs of deterioration in the test substance, and no evidence of corrosion in the packaging material due to the test substance.</td>
<td>478016-01</td>
<td>Y</td>
</tr>
<tr><td>.6319 Miscibility</td><td>The product is not a liquid.</td><td></td><td>N/A</td></tr>
<tr><td>.6320 Corrosion Characteristics</td><td>The sample container exhibited no physical changes from the initial baseline, except for slight variation in weight.</td><td>478016-01</td><td>Y</td></tr>
<tr><td>.6321 Dielectric Breakdown Voltage</td><td>Not required</td><td></td><td>N/A</td></tr>
<tr><td>.7000 pH</td><td>6.41 at 25^{0}C (1% w/v aqueous solution)</td><td>473275-04</td><td>Y</td></tr>
</table>

<table>
<tr><td>.7050 UV/Visible Absorption</td><td>Under three pH conditions—neutral, alkaline and acidic—the maximum absorption occurred at 221 and 276 nm for the neutral solution, 221 and 275 nm for the acidic solution, and 222 and 275 nm for the basic solution. Results are summarized in the following table.
<table>
<tr><th>Solvent</th><th>Wavelength λ [nm]</th><th>Absorption AU</th><th>Molar absorptivity ε</th></tr>
<tr><td rowspan="2">Neutral MeOH</td><td>221</td><td>1.316</td><td>14016.5</td></tr>
<tr><td>276</td><td>1.079</td><td>972.2</td></tr>
<tr><td rowspan="2">Acidic MeOH</td><td>221</td><td>1.288</td><td>18291.0</td></tr>
<tr><td>275</td><td>0.661</td><td>952.3</td></tr>
<tr><td rowspan="2">Basic MeOH</td><td>222</td><td>1.306</td><td>16228.3</td></tr>
<tr><td>275</td><td>0.662</td><td>944.6</td></tr>
</table></td><td>473275-04</td><td>Y</td></tr>
<tr><td>.7100 Viscosity</td><td>The product is not a liquid.</td><td></td><td>N/A</td></tr>
<tr><td>.7200 Melting Point/Melting Range</td><td>Melting range: 75.7 - 78.7^{0}C</td><td>473275-04</td><td>Y</td></tr>
<tr><td>.7220 Boiling Point/Boiling Range</td><td>The product is not a liquid.</td><td></td><td>N/A</td></tr>
<tr><td>.7300 Density/ Relative Density/ Bulk Density</td><td>Density = 1.32 g/ml (=11 lbs/ gal.) at 20^{0}C</td><td>473275-04</td><td>Y</td></tr>
<tr><td>.7370 Dissociation Constant in Water</td><td>Does not contain any functionality that would dissociate.</td><td>473275-05</td><td>N/A</td></tr>
<tr><td>.7570 Partition Coefficient (Octanol/Water)</td><td>log P = 3.11 (~ Tomlin, "The Pesticide Manual," 13th edition, p. 986, BCPC Publications, Hampshire, 2003)</td><td></td><td>Y</td></tr>
<tr><td>.7840 Solubility (in water and organic solvents)</td><td>• Solubility in water: 64 mg/L at 20^{0}C (~ Tomlin, "The Pesticide Manual," 13th edition, p. 986, BCPC Publications, Hampshire, 2003)
• Soluble in organic solvents:
<table>
<tr><th>Organic solvent</th><th>Solubility (g/100 ml)</th></tr>
<tr><td>Hexane</td><td>0.5432</td></tr>
<tr><td>Methanol</td><td>43.3841</td></tr>
<tr><td>1-Octanol</td><td>8.7718</td></tr>
</table></td><td>473275-05 &-04</td><td>Y</td></tr>
<tr><td>.7950 Vapor Pressure</td><td>0.02 mPa at 20^{0}C. (~ Tomlin, "The Pesticide Manual," 13th edition, p. 986, BCPC Publications, Hampshire, 2003)</td><td>473275-05</td><td>Y</td></tr>
</table>

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradable; I = Incomplete or in progress; W = Waived.

830-1800 Enforcement Analytical Method

The active ingredient, Triadimefon, in this product was determined by using Gas Chromatography (GC) with a Flame Ionization Detector (MRID No. 473275-01). The GC operating conditions are set as follows: Equipment: Varian CP-3800 Gas Chromatograph, Varian 1177 injector; Column: Phenomenex ZB-5 column (95% methyl polysiloxane), 30 m length x 0.32 mm inner diameter x 1.0 µm film thickness; Column (oven) temperature: initial 120^{0}C for 2.6 min, increased: 15^{0}C/min hold for 1.7 min, final: 290^{0}C; Make-up gas: Helium; Carrier gas: Helium, 1.5 ml/min constant flow; Retention time: 11.27 min. A calibration curve was calculated by a linear regression technique using the concentration of the active ingredient versus the ratio of the active ingredient peak area to reference standard peak area, Quantitation of Triadimefon is calculated via comparison to a calibration curve.

Manufacturing process information may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

11/JUN/2008

MEMORANDUM

Subject:	Name of Pesticide Product:	Triadimefon Technical
	EPA File Symbol:	84229-L
	DP Barcode:	D349845
	Decision No.:	388811
	Action Code:	R310
	PC Code:	109901 (triadimefon)

From: Eugenia McAndrew, Biologist
Technical Review Branch
Registration Division (7505P)

To: Rosemary Kearns, RM Team 22
Fungicide Branch
Registration Division (7505P)

Applicant: Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

FORMULATION FROM LABEL:

Active Ingredient(s):	% by wt.
Triadimefon.	99.0
Inert Ingredient(s):	1.0
Total:	100.0%

ACTION REQUESTED: The Risk Manager requests review of acute toxicity data for 84229-L.

BACKGROUND: Tide International USA, Inc has submitted a six pack of acute toxicity studies to support the proposed product, Triadimefon Technical, EPA File Symbol 84229-L. The studies were conducted at Stillmeadow, Inc. with assigned MRID numbers 473275-06 to -11. A CSF dated January 14, 2008 for a basic formulation is included in the submission. An Agency contractor, Oak Ridge National Laboratory, conducted the primary review of the studies. TRB performed the secondary review and made changes as necessary.

RECOMMENDATIONS: The six studies have been reviewed and are classified as acceptable.

The acute toxicity profile for Triadimefon Technical, EPA File Symbol 84229-L, is as follows:

Acute oral toxicity	III	Acceptable	MRID 47327506
Acute dermal toxicity	IV	Acceptable	MRID 47327507
Acute inhalation toxicity	IV	Acceptable	MRID 47327508
Primary eye irritation	IV	Acceptable	MRID 47327509
Primary skin irritation	IV	Acceptable	MRID 47327510
Dermal sensitization	Negative	Acceptable	MRID 47327511

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for the proposed product as obtained from the Label Review System:

PRODUCT ID #: 084229-00005

PRODUCT NAME: Triadimefon Technical

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

First Aid:

If swallowed:
-Call a poison control center or doctor immediately for treatment advice.
-Have person sip a glass of water if able to swallow.
-Do not induce vomiting unless told to by a poison control center or doctor.
-Do not give anything to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

DATA EVALUATION RECORD

TRIADIMEFON

STUDY TYPE: ACUTE ORAL TOXICITY - RAT [OPPTS 870.1100; OECD 425]
ACUTE DERMAL TOXICITY - RAT [OPPTS 870.1200; OECD 402]
ACUTE INHALATION TOXICITY - RAT [OPPTS 870.1300; OECD 403]
ACUTE EYE IRRITATION - RABBIT [OPPTS 870.2400; OECD 405]
ACUTE DERMAL IRRITATION - RABBIT [OPPTS 870.2500; OECD 404]
DERMAL SENSITIZATION - GUINEA PIG [OPPTS 870.2600; OECD 406]
MRID: 47327506, 47327507, 47327508, 47327509, 47327510, and 47327511

Prepared for

Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Prepared by

Toxicology and Hazard Assessment Group
Environmental Sciences Division
Oak Ridge National Laboratory
Oak Ridge, TN 37831
Task Order No. 1-19

Primary Reviewer:
Donna L. Fefee, D.V.M.

Signature: _____
Date: _____

Secondary Reviewers:
Dana F. Glass, D.V.M.

Signature: _____
Date: _____

Robert H. Ross, M.S., Group Leader

Signature: _____
Date: _____

Quality Assurance:
Kimberly G. Slusher, M.S.

Signature: _____
Date: _____

Disclaimer

This review may have been altered subsequent to the contractor=s signatures above.

Reviewer: ORNL **Date:** April 26, 2008
Risk Manager (EPA): 22

STUDY TYPE: Acute Oral Toxicity – Rat; OPPTS 870.1100; OECD 425

TEST MATERIAL: Triadamefon Technical; 98.95% a.i.; Batch No. 20060913; white powder; stored at room temperature

CITATION: Kuhn, J. (2007) Acute oral toxicity study (UDP) in rats. Study Number 10528-06. Unpublished study prepared by STILLMEADOW, Inc., Sugar Land, Texas. March 30, 2007. MRID 47327506.

SPONSOR: Zhejiang Tide Cropscience Co., Ltd., Irvine, California.

EXECUTIVE SUMMARY: In an acute oral toxicity study (MRID 47327506), 12 fasted female Sprague-Dawley albino rats were given single oral gavage doses of Triadamefon Technical (98.95% a.i.; Batch No. 20060913) in deionized water (40% or 50% w/v concentrations) at dose levels of 175 (1 animal), 550 (1 animal), 1750 (3 animals), or 5000 (7 animals) mg/kg bw and then observed for 14 days. The animals weighed 172-201 g and were supplied by Texas Animal Specialties, Humble, Texas. Dosing was conducted as an initial limit test with three animals at 5000 mg/kg bw (100% mortality) and then according to AOT425statpgm.

The animals dosed at 5000 mg/kg bw in the limit test died on days 1 or 3, and the four animals dosed at 5000 mg/kg bw in the up-and-down procedure died during days 2-6. Two/three animals dosed at 1750 mg/kg bw died on days 5 or 7. Abnormal clinical signs in the animals that died included tremors, ataxia, loss of righting reflex, sensitivity to sound or touch, decreased activity, alopecia or swelling around the eyes, diarrhea, polyuria, lateral recumbency, and nasal discharge. The surviving 1750 mg/kg animal exhibited hyperactivity (days 0-1) followed by emaciation, piloerection, sensitivity to touch, hunched posture, and biting at it's tail and cage on day 3, with recovery by day 4. The animals dosed at 175 and 550 mg/kg bw appeared normal for the duration of the study, and all of the surviving animals gained weight during both weeks of the study. Abnormal gross necropsy findings were noted in the animals that died and included the following: emaciation, red discoloration of the lungs, grey or dark red and brown discoloration of the liver, discolored and/or liquid gastrointestinal contents or empty gastrointestinal tract, and/or matted, wet, stained, or crusted fur.

LD_{50} Females = 1750 mg/kg bw (95% PL Confidence interval 316.4 to 2720 mg/kg bw)

Based on the acute oral LD_{50}, Triadamefon Technical is in EPA Toxicity Category III.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute oral study (OPPTS 870.1100; OECD 425) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

AOT425statpgm (Version: 1.0) Test Results and Recommendations
Acute Oral Toxicity (OECD Test Guideline 425) Statistical Program

Date/Time: Saturday, April 26, 2008, 11:54:24 PM
Data file name: work.dat
Last modified: 4/26/2008 11:54:20 PM

Test/Substance: Triadamefon Technical
Test type: Main Test
Limit dose (mg/kg): 5000
Assumed LD50 (mg/kg): Default
Assumed sigma (mg/kg): 0.5

Recommended dose progression: 5000, 1750, 550, 175, 55, 17.5, 5.5, 1.75

DATA:

Test Seq.	Animal ID	Dose (mg/kg)	Short-term Result	Long-term Result
1	111	175	O	O
2	112	550	O	O
3	113	1750	O	O
4	114	5000	O	X
5	115	5000	X	X
6	116	1750	O	X
7	117	5000	X	X
8	118	1750	O	X
9	119	5000	X	X

(X = Died, O = Survived)

Dose Recommendation: The main test is complete.
Stopping criteria met: 5 reversals in 6 tests.

SUMMARY OF LONG-TERM RESULTS in MAIN TEST:

Dose	O	X	Total
175	1	0	1
550	1	0	1
1750	1	2	3
5000	0	4	4
All Doses	3	6	9

Statistical Estimate based on long term outcomes:
Estimated LD50 = 1750 (The one dose with partial response).
95% PL Confidence interval is 316.4 to 2720.

A. **Mortality:** The animals dosed at 5000 mg/kg bw in the limit test died on day 1 (two animals) or day 3 (1 animal). The four animals dosed at 5000 mg/kg bw in the up-and-down procedure died during days 2-6. Two/three animals dosed at 1750 mg/kg bw died, one each on days 5 and 7.

B. **Clinical observations:** Clinical signs in the animals that died included tremors, ataxia, loss of righting reflex, sensitivity to sound or touch, decreased activity, alopecia or swelling around the eyes, diarrhea, polyuria, lateral recumbency, and nasal discharge. Clinical signs in the surviving 1750 mg/kg animal included hyperactivity (days 0-1) followed by emaciation, piloerection, sensitivity to touch, hunched posture, and biting at it's tail and cage on day 3, with recovery by day 4. The animals dosed at 175 and 550 mg/kg bw appeared normal for the duration of the study, and all of the surviving animals gained weight during both weeks of the study.

C. **Gross necropsy:** Findings from the surviving 1750 mg/kg animal were not recorded, and there were no abnormal findings in the other surviving animals. Abnormal findings in the animals that died included emaciation, red discoloration of the lungs, grey or dark red and brown discoloration of the liver, discolored and/or liquid gastrointestinal contents or empty gastrointestinal tract, and/or matted, wet, stained, or crusted fur.

D. **Reviewer's conclusions:** The acute oral LD_{50} in females is 1750 mg/kg bw (95% PL Confidence interval 316.4 to 2720 mg/kg bw). This places the test material in EPA Toxicity Category III.

E. **Deviations:** Gross necropsy results were not recorded for Animal # 113 which was dosed at 1750 mg/kg. This deviation did not affect the outcome of the study.

Reviewer: ORNL **Date:** April 27, 2008
Risk Manager (EPA): 22

STUDY TYPE: Acute Dermal Toxicity – Rabbit; OPPTS 870.1200; OECD 402

TEST MATERIAL: Triadamefon Technical; 98.95% a.i.; Batch No. 20060913; white powder; stored at room temperature

CITATION: Kuhn, J. (2007) Acute dermal toxicity study in rabbits. Study Number 10529-06. Unpublished study prepared by STILLMEADOW, Inc., Sugar Land, Texas. February 22, 2007. MRID 47327507.

SPONSOR: Zhejiang Tide Cropscience Co., Ltd., Irvine, California.

EXECUTIVE SUMMARY: In an acute dermal toxicity study (MRID 47327507), groups of five male and five female New Zealand white rabbits were dermally exposed to Triadamefon Technical (98.95% a.i.; Batch No. 20060913) moistened with deionized water at a dose of 5050 mg/kg bw for 24 hours. The doses were applied to clipped application sites on the dorsal trunk (~10% of the body surface area), covered by an 8 inch by 4 inch, 4-ply surgical gauze patch secured with non-irritating adhesive tape, and further protected by wrapping the trunk of the animal with an orthopedic stockinette that was held in place with non-irritating adhesive tape. The animals were then observed for 14 days, including evaluation of the dose sites for dermal irritation on days 1, 4, 7, 11, and 14. The animals were 2-3 months old (males: 2.60-2.85 kg; females: 3.35-2.95 kg) and supplied by Nichols Rabbitry Inc., Lumberton, Texas.

There were no deaths, and abnormal clinical signs were limited to very slight erythema on the application sites of two females on day 1 and alopecia on the forepaws of two males on day 7 through day 13 or 14. Two males and one female lost weight during the first week but gained sufficient weight during the second week so that their initial body weights were exceeded. The remaining animals gained weight during both weeks of the study. There were no abnormal gross necropsy findings.

LD_{50} Males > 5050 mg/kg bw
LD_{50} Females > 5050 mg/kg bw
LD_{50} Combined > 5050 mg/kg bw

Based on the acute dermal LD_{50}, Triadamefon Technical is in EPA Toxicity Category IV.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute dermal study (OPPTS 870.1200; OECD 402) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Dose (mg/kg bw)	Mortality/Number Tested		
	Males	Females	Combined
5050	0/5	0/5	0/10

A. **Mortality:** There were no deaths.

B. **Clinical observations:** Abnormal clinical signs were limited to very slight erythema on the application sites of two females on day 1 and alopecia on the forepaws of two males on day 7 through day 13 or 14. Two males and one female lost weight during the first week but gained sufficient weight during the second week so that their initial body weights were exceeded. The remaining animals gained weight during both weeks of the study.

C. **Gross necropsy:** There were no abnormal findings.

D. **Reviewer's conclusions:** In agreement with the study author, the acute dermal LD_{50} for males, females, and the combined sexes is greater than 5050 mg/kg bw. This places the test material in EPA Toxicity Category IV.

Reviewer: ORNL **Date:** April 27, 1008
Risk Manager (EPA): 22

STUDY TYPE: Acute Inhalation Toxicity – Rat; OPPTS 870.1300; OECD 403

TEST MATERIAL: Triadamefon Technical; 98.95% a.i.; Batch No. 20060913; white powder; stored at room temperature

CITATION: Crutchfield, V. (2007) Acute inhalation toxicity study in rats. Study Number 10530-06. Unpublished study prepared by STILLMEADOW, Inc., Sugar Land, Texas. March 5, 2007. MRID 47327508.

SPONSOR: Zhejiang Tide Cropscience Co., Ltd., Irvine, California.

EXECUTIVE SUMMARY: In an acute inhalation toxicity study (MRID 47327508), groups of five male and five female Sprague-Dawley rats were exposed by nose-only inhalation to finely ground, undiluted Triadamefon Technical (98.95% a.i.; Batch No. 20060913) as an aerosol at a mean gravimetric concentration of 2.27 mg/L for 4 hours. The animals were observed for 14 days. The MMAD was 3.1 μm and the GSD was 5.95. The animals were approximately 8-9 weeks old (males: 270-309 g; females: 183-202 g) and supplied by Texas Animal Specialties, Humble, Texas.

There were no deaths or abnormal gross necropsy findings. All of the animals exhibited piloerection and decreased activity beginning on day 0, half an hour after exposure, and continuing through day 5. All of the animals gained weight during both weeks of the study; however, two females gained only 1-2 g during the first week.

LC_{50} Males > 2.27 mg/L
LC_{50} Females > 2.27 mg/L
LC_{50} Combined > 2.27 mg/L

Based on the 4-hour inhalation exposure LC_{50}, Triadamefon Technical is classified as EPA Toxicity Category IV.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute inhalation study (OPPTS 870.1300; OECD 403) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Nominal Conc. (mg/L)	Gravimetric Conc. (mg/L)	MMAD (μm)	GSD	Mortality/Number Tested		
				Males	Females	Combined
12.9	1.98-2.41	3.0-3.2	5.9-6.0	0/5	0/5	0/10

Test atmosphere / Chamber description: The test material was aspirated from a motorized revolving disc delivery system coupled to a Gem T Trost Air Mill, and the resultant aerosol was sprayed directly into the 500-liter, nose-only, stainless-steel inhalation chamber. Chamber airflow was maintained via a calibrated orifice plate.

Gravimetric Conc. (mg/L):	1.98-2.41
Chamber Volume (L):	500
Total Airflow (L/min):	181
Temperature (° C)	20.1-20.6
Relative Humidity (%)	34.8-37.1
Time to equilibrium (minutes):	13

Test atmosphere concentration: Gravimetric samples were collected from the breathing zone of the animals at 30-minute intervals during exposure (8 samples in all). The test atmosphere was drawn through pre-weighed filters at a rate of 1.87 L/min for one minute, and the mass collected was divided by the total volume of air sampled.

Particle size determination: Samples were collected twice during exposure by drawing air (at 7.3 L/min for 20 seconds) through an 8-Stage cascade impactor. The mass median aerodynamic diameter (MMAD) and geometric standard deviation (GSD) were determined using probit analysis software.

A. **Mortality:** There were no deaths.

B. **Clinical observations:** All of the animals exhibited piloerection and decreased activity beginning on day 0, half an hour after exposure, and continuing through day 5. All of the animals gained weight during both weeks of the study; however, two females gained only 1-2 g during the first week.

C. **Gross necropsy:** There were no abnormal findings.

D. **Reviewer's conclusions:** The 4-hour inhalation exposure LC_{50} for males, females, and the combined sexes is greater than 2.27 mg/L. This places the test material in EPA Toxicity Category IV.

Reviewer: ORNL **Date:** April 27, 2008
Risk Manager (EPA): 22

STUDY TYPE: Primary Eye Irritation – Rabbit; OPPTS 870.2400; OECD 405

TEST MATERIAL: Triadamefon Technical; 98.95% a.i.; Batch No. 20060913; white powder; stored at room temperature

CITATION: Kuhn, J. (2007) Acute eye irritation study in rabbits. Study Number 10531-06. Unpublished study prepared by STILLMEADOW, Inc., Sugar Land, Texas. February 13, 2007. MRID 47327509.

SPONSOR: Zhejiang Tide Cropscience Co., Ltd., Irvine, California.

EXECUTIVE SUMMARY: In a primary eye irritation study (MRID 47327509), 0.1 mL (68.5 mg) of undiluted Triadamefon Technical (98.95% a.i.; Batch No. 20060913) was instilled into the conjunctival sac of the right eye of 2 male and 1 female New Zealand white rabbits, and the upper and lower lids were held shut for approximately one second. Eyes were scored for ocular irritation according to the Draize method 1, 24, 48, and 72 hours after instillation, and the irritation scores were classified according to the system of Kay and Calandra. Treated eyes were washed with room temperature deionized water for 1 minute upon completion of the 24-hour observation, and the untreated left eye of each animal served as a control. The animals were supplied by Nichols Rabbitry Inc., Lumberton, Texas (males: 2.93-3.10 kg; female: 3.05 kg).

One hour after treatment, all treated eyes showed a trace of the test material, and one had grade 1 iritis, grade 1 corneal opacity involving greater than 75% of the cornea, and grade 2 conjunctival redness. All treated eyes were normal at 24 hours, and there was also no uptake of fluorescein stain at this time point. The maximum mean total score (MMTS) was 9.7, recorded 1 hour after test material instillation.

In this study, the formulation is minimally irritating. Triadamefon Technical is classified as EPA Toxicity Category IV for primary eye irritation.

This study is classified as acceptable. It does satisfy the guideline requirements for a primary eye irritation study (OPPTS 870.2400; OECD 405) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Observations	Number "positive"/Number treated			
	Hours			
	1	24	48	72
Corneal Opacity	1/3	0/3	0/3	0/3
Iritis	1/3	0/3	0/3	0/3
Conjunctivae:				
Redness*	1/3	0/3	0/3	0/3
Chemosis*	0/3	0/3	0/3	0/3
Discharge**	0/3	0/3	0/3	0/3

* Score of 2 or more required to be considered "positive"
** Discharge does not indicate a positive effect according to the grading scale

A. **Observations:** One hour after treatment, all treated eyes showed a trace of the test material, and one had grade 1 iritis, grade 1 corneal opacity involving greater than 75% of the cornea, and grade 2 conjunctival redness. All treated eyes were normal at 24 hours, and there was also no uptake of fluorescein stain at this time point.

B. **Results:** The maximum mean total score (MMTS) was 9.7, recorded 1 hour after test material instillation.

C. **Reviewer's conclusions:** The test material is minimally irritating to the eye and is classified as EPA Toxicity Category IV.

Reviewer: ORNL **Date:** April 26, 2008
Risk Manager (EPA): 22

STUDY TYPE: Primary Dermal Irritation – Rabbit; OPPTS 870.2500; OECD 404

TEST MATERIAL: Triadamefon Technical; 98.95% a.i.; Batch No. 20060913; white powder; stored at room temperature

CITATION: Kuhn, J. (2007) Acute dermal irritation study in rabbits. Study Number 10532-06. Unpublished study prepared by STILLMEADOW, Inc., Sugar Land, Texas. February 6, 2007. MRID 47327510.

SPONSOR: Zhejiang Tide Cropscience Co., Ltd., Irvine, California.

EXECUTIVE SUMMARY: In a primary dermal irritation study (MRID 47327510), two male and one female New Zealand White rabbits were dermally exposed for 4 hours to 500 mg of Triadamefon Technical (98.95% a.i.; Batch No. 20060913) moistened with 0.1 mL of deionized water. The doses were applied to intact, clipped application sites on the dorsal trunk, covered by a 2.5 cm by 2.5 cm, 4-ply gauze patch, which was secured to the skin with non-irritating adhesive tape and protected by wrapping the trunk of the animal with an orthopedic stockinette that was held in place with non-irritating adhesive tape. The application sites were observed and scored at 1, 24, 48, and 72 hours after patch removal. The animals were approximately 3 months old (males: 3.10-3.28 kg; female: 3.08 kg) and supplied by Nichols Rabbitry Inc., Lumberton, Texas.

No erythema, edema, or other signs of dermal irritation were noted on any animal at any time during the study.

In this study, the formulation is non-irritating. Triadamefon Technical is classified as EPA Toxicity Category IV for primary dermal irritation. The Primary Irritation Index (PII) = 0.0.

This study is classified as acceptable. It does satisfy the guideline requirements for a primary dermal irritation study (OPPTS 870.2500; OECD 404) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Animal Number	Sex	Hours			
		1	24	48	72
1086	Male	0/0 [a]	0/0	0/0	0/0
1088	Male	0/0	0/0	0/0	0/0
1093	Female	0/0	0/0	0/0	0/0
Severity of Irritation: Mean Score		0.0/0.0	0.0/0.0	0.0/0.0	0.0/0.0

[a] Erythema/Edema

A. **Observations:** No erythema, edema, or other signs of dermal irritation were noted on any animal at any time during the study.

B. **Results:** The Primary Irritation Index (PII) was 0.0.

C. **Reviewer's conclusions:** In agreement with the study author, the test material was non-irritating and is classified as EPA Toxicity Category IV for skin effects.

Reviewer: ORNL **Date:** April 26, 2008
Risk Manager (EPA): 22

STUDY TYPE: Dermal Sensitization – Guinea Pig; OPPTS 870.2600; OECD 406

TEST MATERIAL: Triadamefon Technical; 98.95% a.i.; Batch No. 20060913; white powder; stored at room temperature

CITATION: Kuhn, J. (2007) Skin sensitization study in guinea pigs. Study Number 10533-06. Unpublished study prepared by STILLMEADOW, Inc., Sugar Land, Texas. March 15, 2007. MRID 47327511.

SPONSOR: Zhejiang Tide Cropscience Co., Ltd., Irvine, California.

EXECUTIVE SUMMARY: In a dermal sensitization study (MRID 47327511), 15 male and 15 female Hartley-Albino guinea pigs were tested using the Buehler method with 400 mg of Triadamefon Technical (98.95% a.i.; Batch No. 20060913) moistened with 0.4 mL of deionized water. The animals were approximately 4 weeks old (males: 319-378 g; females: 325-378 g) and supplied by Charles River Laboratories, Wilmington, Massachusetts.

For each of three successive weekly inductions, 400 mg of the test material moistened with 0.4 mL of deionized water was applied to twenty test animals for a six hour exposure period. After a two week rest period, the 20 test aninmals and 10 naïve control animals were challenged with 400 mg of the test material moistened with 0.4 mL of deionized water. Following challenge, no erythema was seen at any dose site.

Based on the results of this study, Triadamefon Technical is *not* a dermal sensitizer.

This study is classified as acceptable. It does satisfy the guideline requirements for a dermal sensitization study (OPPTS 870.2600; OECD 406) in the guinea pig.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

PROCEDURE:

A. **Induction:** The dorsal trunk of each animal was clipped one day prior to each treatment. For each of three successive weekly inductions, 400 mg of the test material moistened with 0.4 mL of deionized water was applied beneath a 4-ply, 2.5 cm by 2.5 cm surgical gauze patch placed laterally from the midline on the left front quadrant of the dorsal trunk and secured with nonirritating adhesive tape. The patch was then covered with a securely taped strip of clear polyethylene film, and each animal was placed in a restrainer for the duration of the 6-hour exposure. Reactions were scored at 24 and 48 hours after the first induction and at 24 hours (only) after the second and third induction.

B. **Challenge:** Twenty-eight days after the first induction, the animals were challenged with 400 mg of the test material moistened with 0.4 mL of deionized water applied to (previously clipped) naive sites lateral to the midline on the right rear quadrant of the dorsal trunk for 6 hours using the same procedure. Reactions were scored 24 and 48 hours post application.

C. **Naïve controls:** At challenge a separate "naive" group of 10 previously untreated animals (5 male and 5 female) was also treated with 400 mg of the test material moistened with 0.4 mL of deionized water using the same procedure. Reactions were scored 24 and 48 hours post application.

RESULTS and DISCUSSION:

A. **Reactions and durations:** No reactions were seen at any dose site, following induction or challenge.

B. **Positive control:** The results of a positive control study using 1-chloro-2,4-dinitrobenzene (DNCB) were included in the study report. The study was conducted within six months of the submitted study, and the results were appropriate.

C. **Reviewer's conclusion:** In agreement with the study author, the test material is not a dermal sensitizer.

1. **DP BARCODE:** D349845
2. **PC CODE:** 109901
3. **CURRENT DATE:** April 27, 2008
4. **TEST MATERIAL:** Triadimefon (Triadamefon Technical); 98.95% a.i.; Batch No. 20060913; white powder; stored at room temperature

Study/Species/Lab Study # / Date	MRID	Results	Tox. Cat.	Core Grade
Acute oral toxicity/rat STILLMEADOW, Inc. Study #10528-06/March 30, 2007	47327506	LD_{50} Females = 1750 mg/kg bw	III	A
Acute dermal toxicity/rabbit STILLMEADOW, Inc. Study #10529-06/February 22, 2007	47327507	LD_{50} > 5050 mg/kg bw Males, females combined	IV	A
Acute inhalation toxicity/rat STILLMEADOW, Inc. Study #10530-06/March 5, 2007	47327508	LC_{50} Males > 2.27 mg/L LC_{50} Females > 2.27 mg/L LC_{50} Combined > 2.27 mg/L	IV	A
Primary eye irritation/rabbit STILLMEADOW, Inc. Study #10531-06/February 13, 2007	47327509	Minimally irritating	IV	A
Primary dermal irritation/ rabbit STILLMEADOW, Inc. Study #10532-06/February 6, 2007	47327510	Non irritating PII = 0.0	IV	A
Dermal sensitization/guinea pig STILLMEADOW, Inc. Study #10533-06/March 15, 2007	47327511	Not a sensitizer	--	A

Core Grade Key: A = Acceptable, S = Supplementary, U = Unacceptable, W = Waived

United States Environmental Protection Agency Washington, D.C. 20460

DATA CALL-IN RESPONSE

OMB Approval 2070-0107
OMB Approval 2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name	3. Date and Type of DCI and Number
TIDE INTERNATIONAL, USA, INC. 4110 136TH ST. NW GIG HARBOR, WA 98332	2700 Triadimefon Chemical # and Name 109901 Triadimefon	15-Jul-2008 PRODUCT SPECIFIC ID # PDCI-109901-26665

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
84229-5		N.A.	N.A.	YES	

8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative [signature]

9. Date 11/12/08

10. Name of Company Tide International USA, Inc.

11. Phone Number 253-853-3[illegible]

United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name	3. Date and Type of DCI and Number
TIDE INTERNATIONAL, USA, INC. 4110 136TH ST. NW GIG HARBOR, WA 98332	2700 Triadimefon EPA Reg. No. 84229-5	15-Jul-2008 PRODUCT SPECIFIC ID # PDCI-109901-26665

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
	Product Chemistry Data Requirements (Conventional Chemical)									
830.1550	Product Identity and composition	(1)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.1600	Description of materials used to produce the product	(2)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.1620	Description of production process	(3)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	6
830.1650	Description of formulation process	(4)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	7
830.1670	Discussion of formation of impurities	(5)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
.1700	Preliminary analysis	(6 ,7 ,8)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	6
830.1750	Certified limits	(9 ,10)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.1800	Enforcement analytical method	(11)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.6302	Color	(19)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.6303	Physical state	(22)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.6304	Oder	(46)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

Signature and Title of Company's Authorized Representative MY Agent

11. Date 11/12/08

12. Name of Company Tide International USA Inc

13. Phone Number 11/12/08

United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name	3. Date and Type of DCI and Number
TIDE INTERNATIONAL, USA, INC. 4110 136TH ST. NW GIG HARBOR, WA 98332	2700 Triadimefon EPA Reg. No. 84229-5	15-Jul-2008 PRODUCT SPECIFIC ID # PDCI-109901-26665

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	(12 ,13)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	7
830.6314	Oxidizing or reducing action	(14)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	6
830.6315	Flammability	(15)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	7
830.6316	Explodability	(16)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	7
830.6317	Storage stability of product	(17)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.6319	Miscibility	(18)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	7
[illegible]6320	Corrosion characteristics	(20)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.6321	Dielectric breakdown voltage	(21)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	7
830.7000	pH of water solutions of suspensions	(27 ,28)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.7050	UV/Visible absorption						A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	6
830.7100	Viscosity	(29)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	7
830.7200	Melting point/melting range	(30 ,31)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	6

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date 11/12/08

United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name	3. Date and Type of DCI and Number
TIDE INTERNATIONAL, USA, INC. 4110 136TH ST. NW GIG HARBOR, WA 98332	2700 Triadimefon EPA Reg. No. 84229-5	15-Jul-2008 PRODUCT SPECIFIC ID # PDCI-109901-26665

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
830.7220	Boiling point/boiling range	(47 ,48)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	7
830.7300	Density/relative density	(32 ,33)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	6
830.7370	Dissociation constant in water	(23 ,24)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	7
830.7550	Partition coefficient (n-octanol/water), shake flask method	(25)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	6
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	(26)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	6
830.7840	Water solubility: Column elution method, shake flask method	(49)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	6
[illegible]7860	Water solubility, generator column method	(34)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	6
830.7950	Vapor pressure	(35 ,36)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	6, 7
	Toxicology Data Requirements (Conventional Chemical)									
870.1100	Acute Oral Toxicity	(40)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI,EP,dilute EP?	8	6
870.1200	Acute dermal toxicity	(37 ,38)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI,EP,dilute EP?	8	6
870.1300	Acute inhalation toxicity	(39)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6

Initial to indicate certification as to information on this page (full text of certification is on page one). M

Date 11/13/08

United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address

TIDE INTERNATIONAL, USA, INC.
4110 136TH ST. NW
GIG HARBOR, WA 98332

2. Case # and Name

2700 Triadimefon

EPA Reg. No. 84229-5

3. Date and Type of DCI and Number

15-Jul-2008
PRODUCT SPECIFIC
ID # PDCI-109901-26665

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
870.2400	Acute eye irritation	(41)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6
870.2500	Acute dermal irritation	(42 ,43)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6
870.2600	Skin sensitization	(44 ,45)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6

Initial to indicate certification as to information on this page (full text of certification is on page one). MM

Date 11/12/08

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date July 2, 2009	EPA Reg. No./File Symbol 84229-5	Page 1 of 3
Applicant's/Registrant's Name & Address Tide International USA, Inc. 21 Hubble Irvine, CA 92618	Product Triadimefon Technical	

Ingredient Triadimefon (CAS No. 43121-43-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	47327501	Tide International USA, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	47327501	Tide International USA, Inc.	OWN	
830.1620	Description of Production Process	47327501	Tide International USA, Inc.	OWN	
830.1650	Description of Formulation Process				Not required[1]
830.1670	Discussion of Formation of Impurities	47327501	Tide International USA, Inc.	OWN	
830.1700	Preliminary Analysis	47327502 47327503	Tide International USA, Inc.	OWN	
830.1750	Certified Limits	47327501	Tide International USA, Inc.	OWN	
[redacted].1800	Enforcement Analytical Method	47327501	Tide International USA, Inc.	OWN	
830.6302	Color	47327504	Tide International USA, Inc.	OWN	
830.6303	Physical State	47327504	Tide International USA, Inc.	OWN	
830.6304	Odor	47327504	Tide International USA, Inc.	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Waiver[2]
830.6314	Oxidation/Reduction: Chemical Incompatibility	47327504	Tide International USA, Inc.	OWN	
830.6315	Flammability				Waiver[3]

Signature	Name and Title	Date
Ann M. Tillman	Ann M. Tillman, Consultant	July 2, 2009

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date July 2, 2009	EPA Reg. No./File Symbol 84229-5	Page 2 of 3
Applicant's/Registrant's Name & Address Tide International USA, Inc. 21 Hubble Irvine, CA 92618	Product Triadimefon Technical	

Ingredient Triadimefon (CAS No. 43121-43-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explodability				Waiver[4]
830.6317	Storage Stability	Volume 1	Tide International USA, Inc.	OWN	
830.6319	Miscibility				Not required[5]
830.6320	Corrosion Characteristics	Volume 1	Tide International USA, Inc.	OWN	
830.6321	Dielectric Breakdown Voltage				Not required[6]
830.7000	pH	47327504	Tide International USA, Inc.	OWN	
830.7050	UV/Visible Absorption	47327504	Tide International USA, Inc.	OWN	
830.7100	Viscosity				Not required[7]
830.7200	Melting Point/Melting Range	47327504	Tide International USA, Inc.	OWN	
830.7220	Boiling Point/Boiling Range				Not required[8]
830.7300	Density/Relative Density/Bulk Density	47327504	Tide International USA, Inc.	OWN	
830.7370	Dissociation Constants in Water				Waiver[9]
830.7520	Particle Size, fiber length, and diameter distribution				Waiver[10]
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	47327505	Tide International USA, Inc.	PL	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7560

Signature	Name and Title	Date
Ann M. Tillman	Ann M. Tillman, Consultant	July 2, 2009

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
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DATA MATRIX

Date July 2, 2009	EPA Reg. No./File Symbol 84229-5	Page 3 of 3
Applicant's/Registrant's Name & Address Tide International USA, Inc. 21 Hubble Irvine, CA 92618	Product Triadimefon Technical	

Ingredient Triadimefon (CAS No. 43121-43-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7560
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	47327505 47327504	Tide International USA, Inc.	PL OWN	
830.7860	Water Solubility, Generator Column Method				See 830.7840
830.7950	Vapor Pressure				Waiver[11]
870.1100	Acute Oral Toxicity: Rat	47327506	Tide International USA, Inc.	OWN	
870.1200	Acute Dermal Toxicity: Rat	47327507	Tide International USA, Inc.	OWN	
870.1300	Acute Inhalation Toxicity: Rat	47327508	Tide International USA, Inc.	OWN	
870.2400	Primary Eye Irritation: Rabbit	47327509	Tide International USA, Inc.	OWN	
870.2500	Primary Dermal Irritation	47327510	Tide International USA, Inc.	OWN	
870.2600	Dermal Sensitization	47327511	Tide International USA, Inc.	OWN	

Signature	Name and Title	Date
Ann M. Tillman	Ann M. Tillman, Consultant	July 2, 2009

Endnotes for Data Matrix for Triadimefon Technical

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[1] **830.1650** - These data are not required for the registration of a technical product. See 830.1620 for production process information.

[2] **830.6313** - Tide International USA, Inc. will not be packaging Triadimefon Technical in metal containers, nor is it expected to come into contact with metals or metal ions during its storage. In addition, Triadimefon Technical is not expected to be subjected to temperatures greater than 50°C during its production or storage. Therefore, Tide International USA, Inc. seeks a wavier from the requirement for these data.

[3] **830.6315** - Tide International USA, Inc. requests a waiver from the requirement for flammability for Triadimefon Technical based on the fact that this technical is a solid and is not expected to be flammable. Please refer to the Confidential Statement of Formula for Triadimefon Technical.

[4] **830.6316** - Tide International USA, Inc. requests a waiver from the requirement of this study. Triadimefon Technical does not have the chemical bonds or functional groups associated with explosive chemicals. Please refer to the Confidential Statement of Formula for additional information on the composition of Triadimefon Technical.

[5] **830.6319** – These data are required when the product is an emulsifiable liquid and to be diluted with petroleum solvents. Triadimefon Technical is a solid and not an emulsifiable liquid. Therefore, this data requirement is not applicable to Triadimefon Technical.

[6] **830.6321** – These data are required if the end use product is to be used around electrical equipment. Triadimefon Technical is not an end use product and therefore this data requirement is not applicable.

[7] **830.7100** - These data are required when the product is a liquid. Triadimefon Technical is a solid. Therefore, this data requirement is not applicable to Triadimefon Technical.

[8] **830.7220** – Boiling point data are only required for liquids. Triadimefon Technical is a solid. Therefore, this data requirement is not applicable to Triadimefon Technical.

[9] **830.7370** - Tide International USA, Inc. is seeking a waiver for the dissociation constant for Triadimefon Technical because the chemical does not contain any functionality that would dissociate. The EPA Reregistration Eligibility Decision document for triadimefon listed this data requirement as not being applicable (Ref.: Reregistration Eligibility Decision for Triadimefon and Tolerance Reassessment for Triadimenol, August 2006, Appendix B-1, page 85).

[10] **830.7520** - Tide International USA, Inc. is seeking a waiver for this data requirement for Triadimefon Technical because the product is not water insoluble nor is it a fibrous material.

[11] **830.7950** - Tide International USA, Inc. is seeking a waiver for the vapor pressure requirement on the basis that data are not required for materials that are a solid at room temperature and have a low vapor pressure.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☑ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
84229-5	T. Kish	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Tide International USA, Inc./Triadimefon Technical	22	

5. Name and Address of Applicant *(Include ZIP Code)*

Tide International USA, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☑ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of 8-month response to RED.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging		Water Soluble Packaging		2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No		☐ Yes ☑ No		☐ Metal ☐ Plastic ☐ Glass ☐ Paper ☑ Other (Specify) lined HDPE drum
***Certification must be submitted**	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☐ Container	50 kg	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☑ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Janelle Kay	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingllly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	
	Agent	
4. Typed Name	**5. Date**	
Janelle Kay	July 2, 2009	

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Tide International USA, Inc. c/o Pyxis Regulatory Consulting 4110 136th St. NW Gig Harbor, WA 98332	EPA Registration Number/File Symbol 84229-5
Active Ingredient(s) and/or representative test compound(s) Triadimefon	Date July 2, 2009
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food and Non-food crop; Greenhouse non-food	Product Name Triadimefon Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
	July 2, 2009	Janelle Kay, Agent

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL

EPA Registration #	Date Submitted to EPA	Electronic file name
84229-5	July 2, 2009	084229-00005.20090702 v1.Triadimefon Tech label revised per RED_changes incorp.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

7/27/09
Date

Danielle Kay
Name (typed)

Title

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 15, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

TIDE INTERNATIONAL, USA, INC.
C/O PYXIS REGULATORY CONSULTING, INC
4110 136TH ST. NW
GIG HARBOR, WA 98332-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 13-JUL-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

478016-00

July 2, 2009

COURIER DELIVERY

Veronica Dutch, Chemical Review Manager
Document Processing Desk (DCI/SRRD)
Special Review and Reregistration Branch (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Triadimefon (Case No. 2700; Chemical No. 109901)
Submission of Tide International, USA, Inc. (Company No. 84229) Product Specific Data Call-In (ID No. PDCI-109901-26665) 8-month response
Triadimefon Technical, EPA Reg. No. 84229-5

Dear Ms. Dutch,

On behalf of Tide International, USA, Inc. (Company No. 84229), please find the enclosed 8-month response to the Triadimefon Product Specific Data Call-In for Triadimefon Technical (EPA Reg. No. 84229-5). In support of this submission, we enclose the following:

1. Application for Reregistration (EPA Form 8570-1)
2. Two copies (2) of the basic Confidential Statement of Formula dated July 2, 2009
3. One (1) copy of proposed labeling incorporating changes required by the Triadimefon RED
4. One (1) electronic copy of the proposed labeling
5. One (1) copy of the certification with respect to label integrity
6. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
7. Public File Copy of the Data Matrix (EPA Form 8570-35)
8. Certification with Respect to Citation of Data (EPA Form 8570-34)
9. Product Specific Data

47801601

Volume 1	OPPTS 830.6317 and 830.6320	Kaminsky, M. Triadamefon (sic) Technical; Storage Stability with Corrosion Characteristics

Please note that Tide International, USA, Inc. HAS NOT received any paperwork for the Generic Data Call-In for Triadimefon.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Janelle Kay

Enclosures

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

478016-00

July 2, 2009

COURIER DELIVERY

Veronica Dutch, Chemical Review Manager
Document Processing Desk (DCI/SRRD)
Special Review and Reregistration Branch (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Triadimefon (Case No. 2700; Chemical No. 109901)
Submission of Tide International, USA, Inc. (Company No. 84229) Product Specific Data Call-In (ID No. PDCI-109901-26665) 8-month response
Triadimefon Technical, EPA Reg. No. 84229-5

Dear Ms. Dutch,

On behalf of Tide International, USA, Inc. (Company No. 84229), please find the enclosed 8-month response to the Triadimefon Product Specific Data Call-In for Triadimefon Technical (EPA Reg. No. 84229-5). In support of this submission, we enclose the following:

1. Application for Reregistration (EPA Form 8570-1)
2. Two copies (2) of the basic Confidential Statement of Formula dated July 2, 2009
3. One (1) copy of proposed labeling incorporating changes required by the Triadimefon RED
4. One (1) electronic copy of the proposed labeling
5. One (1) copy of the certification with respect to label integrity
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7. Public File Copy of the Data Matrix (EPA Form 8570-35)
8. Certification with Respect to Citation of Data (EPA Form 8570-34)
9. Product Specific Data

47801601

Volume 1	OPPTS 830.6317 and 830.6320	Kaminsky, M. Triadamefon (sic) Technical; Storage Stability with Corrosion Characteristics

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Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Janelle Kay

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

RECEIVED
JAN 16 2009

CERTIFIED MAIL

Tide International, USA, INC.
4110 136th St., NW
GIG Harbor, WA 98332

Attn: Ms. Janelle Kay, Agent

Subject: Triadimefon Reregistration Eligibility Decision (RED), Product Chemistry Waiver and Time Extension Request for EPA Reg. No. 84229-5.

Dear Ms. Kay:

The Agency has received your waiver request for the product chemistry data requirement for EPA Reg. No. 84229-5. Waivers have been granted for the following studies: Guideline 830.1650, Discussion of Formation of Impurities; Guideline 830.6313, Stability to sunlight, normal and elevated temperatures, metals and metal ions; Guideline 830.6315, Flammability/Flame Extension; Guideline 830.6316, Explodability; and Guideline 830.6319, Miscibility.

Also, in your letter dated November 12, 2008, you requested a time extension until November 1, 2009, for submission of the Storage Stability (Guideline 830.6317) and Corrosion Characteristics (Guideline 830.6320) studies. Based on the rationale provided in your letter, the Agency is granting your request for a time extension for Storage Stability (Guideline 830.6317) until November 1, 2009. Please submit the remaining data to the Agency by March 30, 2009. Failure to comply may result in a Notice of Intent to Suspend your product, EPA Reg. 84229-5. If you have any questions, please contact Veronica Dutch of my staff at (703) 308-8585.

Sincerely,

Patricia L. Moe

Patricia L. Moe, Chief
Product Reregistration Branch
Special Review and Reregistration Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 19 2008

CERTIFIED MAIL

Gro-Pro, LLC
4110 136th Street North West
Gig Harbor, WA 98332

Attn: Ms. Janelle Kay

Subject: Review of Time Extension Request for Storage Stability and Corrosion Characteristics Data for Triadimefon, EPA Reg. No. 84229-5.

Dear Ms. Kay:

The Agency has received your letter dated November 12, 2008, in which you requested a time extension until November 1, 2009, for submission of the Storage Stability (Guideline 830.6317) and Corrosion Characteristics (Guideline 830.6320) studies. Based on the rationale provided in your letter, the Agency is granting your request. Failure to submit these studies within this time frame may result in a Notice of Intent to Suspend your Triadimefon product, EPA Reg. No. 84229-5. If you have any questions, please contact Veronica Dutch of my staff at (703) 308-8585.

Sincerely,

Patricia L. Moe, Chief
Product Reregistration Branch
Special Review and Reregistration Division

CONCURRENCES								
SYMBOL	7508-P							
SURNAME	V. Dutch	Moe						
DATE	12-15-08	12/16/08						

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

11/18/08

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

1 time ext.
must write letter for TE request

November 12, 2008

COURIER DELIVERY

Veronica Dutch, Chemical Review Manager
Document Processing Desk (DCI/SRRD)
Special Review and Reregistration Branch (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Triadimefon (Case No. 2700; Chemical No. 109901)
Submission of Tide International, USA, Inc. (Company No. 84229) Product Specific Data Call-In (ID No. PDCI-109901-26665)
Triadimefon Technical, EPA Reg. No. 84229-5

Dear Ms. Dutch,

On behalf of Tide International, USA, Inc. (Company No. 84229), please find the enclosed 90-day response to the Triadimefon Product Specific Data Call-In for Triadimefon Technical (EPA Reg. No. 84229-5). In support of this submission, we enclose the following:

1. Completed Data Call-In Response Form
2. Completed Requirements Status and Registrant's Response form for Triadimefon Technical (EPA Reg. No. 84229-5) with accompanying justification for waiver requests

Please note that Tide International, USA, Inc. HAS NOT received any paperwork for the Generic Data Call-In for Triadimefon. Also, please note that Tide International, USA, Inc. is respectfully requesting an extension until Nov. 1, 2009 for the submission of storage stability and corrosion characteristics data (OPPTS Guidelines 830.6317 and 830.6320, respectively). EPA just recently granted Tide International USA, Inc. Triadimefon Technical registration in August of 2008. As a condition for registration, EPA requested the submission of these data by Nov. 1, 2009. These data are currently in development and will be submitted upon completion and in advance of the Nov. 1, 2009 due date. Therefore, Tide International USA, Inc. respectfully requests an extension for the submission of these data until Nov. 1, 2009 because Tide International USA, Inc.'s registration was recently granted.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Janelle Kay

Enclosures

RECEIVED
1/14/08

11/18/08

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

1 time ext. & waiver

November 12, 2008

COURIER DELIVERY

Veronica Dutch, Chemical Review Manager
Document Processing Desk (DCI/SRRD)
Special Review and Reregistration Branch (7508P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Triadimefon (Case No. 2700; Chemical No. 109901)
Submission of Tide International, USA, Inc. (Company No. 84229) Product Specific Data Call-In (ID No. PDCI-109901-26665)
Triadimefon Technical, EPA Reg. No. 84229-5

Dear Ms. Dutch,

On behalf of Tide International, USA, Inc. (Company No. 84229), please find the enclosed 90-day response to the Triadimefon Product Specific Data Call-In for Triadimefon Technical (EPA Reg. No. 84229-5). In support of this submission, we enclose the following:

1. Completed Data Call-In Response Form
2. Completed Requirements Status and Registrant's Response form for Triadimefon Technical (EPA Reg. No. 84229-5) with accompanying justification for waiver requests

Please note that Tide International, USA, Inc. HAS NOT received any paperwork for the Generic Data Call-In for Triadimefon. Also, please note that Tide International, USA, Inc. is respectfully requesting an extension until Nov. 1, 2009 for the submission of storage stability and corrosion characteristics data (OPPTS Guidelines 830.6317 and 830.6320, respectively). EPA just recently granted Tide International USA, Inc. Triadimefon Technical registration in August of 2008. As a condition for registration, EPA requested the submission of these data by Nov. 1, 2009. These data are currently in development and will be submitted upon completion and in advance of the Nov. 1, 2009 due date. Therefore, Tide International USA, Inc. respectfully requests an extension for the submission of these data until Nov. 1, 2009 because Tide International USA, Inc.'s registration was recently granted.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Janelle Kay

Enclosures

RECEIVED 11/14/08

MATERIAL TO BE ADDED TO JACKET

REG # 84229-5

Description: PRIA REGISTRATION

check all that apply		
☑	new stamped accepted label	Send to CSC
☐	new CSF	
☐	notification	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's Name: Rose Kearns Date: 8-11-08

Phone: 305-5611 Division: RD

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 15, 2008

COURIER DELIVERY

Tony Kish (PM 22)
Document Processing Desk (FPL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Dear Mr. Kish,

RE: Tide International USA, Inc.
Triadimefon Technical (EPA Reg. No. 84229-5)
Submission of Final Printed Label

On behalf of Tide International USA, Inc., I am submitting the final printed label. In support of this submission, the following documents are enclosed:

1. Application for Registration (EPA Form 8570-1)
2. Two (2) copies of the final printed label
3. Letter of Authorization

We trust you will find this submission complete. However, please feel free to contact me by phone ((253) 853-7369) or by email at Ann@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Ann M. Tillman

Enclosures

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] **Registration**
- [ ] **Amendment**
- [x] **Other**

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
84229-5	T. Kish	☐ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Tide International USA, Inc./ Triadimefon Technical	22	

5. Name and Address of Applicant *(Include ZIP Code)*

Tide International USA, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [x] Final printed labels in reponse to Agency letter dated Aug. 7, 2008
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final printed label.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Metal ☐ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
* ***Certification must be submitted***	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☐ Label ☐ Container		☐ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☐ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Ann Tillman	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	
Ann M Tillman	Agent	
4. Typed Name	**5. Date**	
Ann Tillman	9/15/08	

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
8-7-2008

Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:	
Triadimefon	99.0%
OTHER INGREDIENTS:	1.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Next Page For First Aid, Precautionary Statements And Directions For Use.

EPA Reg. No.: 84229-5
EPA Est. No.: 084154-CHN-001

Net Contents: See Container

Manufactured for: Tide International, USA, Inc. 21 Hubble, Irvine, CA 92618, USA

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
There is no specific antidote. Treat symptomatically. This compound does not cause any definite symptoms that would be diagnostic. Poisoning is accompanied by hyperactivity followed by sedation.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed, absorbed through skin, or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

2

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following use(s):

(1) golf course turfgrass, sod farm turfgrass, outdoor- and greenhouse-grown ornamentals (trees, shrubs, flowering plants, including roses), azaleas (for control of pine-twisting rust only), pine trees (including Christmas trees), pine seedlings, pine seed, and pineapple (pre-plant dip and postharvest dip only);

(2) uses for which US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and

(3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area. If product spills or container leaks, carefully sweep and collect material into a pile. Follow directions below for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

STORAGE AND DISPOSAL (cont'd.)

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the drum for recycling, if available.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE**

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Label Code No.: TI-FUN016001
Date: 08/18/2008 **（Made in China）**

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Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:	
Triadimefon	99.0%
OTHER INGREDIENTS:	1.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Next Page For First Aid, Precautionary Statements And Directions For Use.

EPA Reg. No.: 84229-5
EPA Est. No.: 084154-CHN-001

Net Contents: See Container

Manufactured for: Tide International, USA, Inc. 21 Hubble, Irvine, CA 92618, USA

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
There is no specific antidote. Treat symptomatically. This compound does not cause any definite symptoms that would be diagnostic. Poisoning is accompanied by hyperactivity followed by sedation.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed, absorbed through skin, or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following use(s):

(1) golf course turfgrass, sod farm turfgrass, outdoor- and greenhouse-grown ornamentals (trees, shrubs, flowering plants, including roses), azaleas (for control of pine-twisting rust only), pine trees (including Christmas trees), pine seedlings, pine seed, and pineapple (pre-plant dip and postharvest dip only);

(2) uses for which US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and

(3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area. If product spills or container leaks, carefully sweep and collect material into a pile. Follow directions below for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

STORAGE AND DISPOSAL (cont'd.)

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the drum for recycling, if available.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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Label Code No.: TI-FUN016001
Date: 08/18/2008 **(Made in China)**

TIDE INTERNATIONAL USA INC.

21 HUBBLE, IRVINE, CA 92618, USA • Tel: 1-949-679-3535 • Fax: 1-949-679-3538

August 4, 2008

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang,Ph.D
Vice President

cc: Pyxis Regulatory Consulting, Inc.

Pages 90-92 - Confidential Statement of Formula may be entitled to confidential treatment